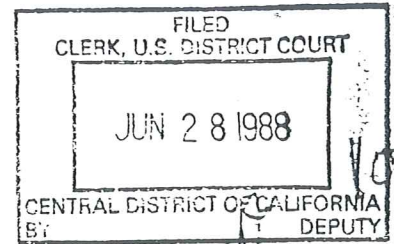


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B-80190
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3 Corcoran, California 93212
4 Attorney in Propria Persona
5
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7



8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA
10

11 ROBERT L. RUSSELL,)
12)
Plaintiff,)
13 vs.)
14 UNITED STATES DEPARTMENT OF JUSTICE,)
FEDERAL BUREAU OF INVESTIGATION,)
15 UNITED STATES TREASURY DEPARTMENT,)
UNITED STATES SECRET SERVICE,)
16 UNITED STATES AIR FORCE,)
UNITED STATES NAVY,)
17 DOES 1 THROUGH 1,000, INCLUSIVE,)
AND EACH OF THEM. Defendants.)
18

DOCKET NO.

88-03718

COMPLAINT FOR
INFRINGEMENT OF CIVIL
RIGHTS AND FOR
DECLARATORY RELIEF
(42 U.S.C. Section 1983,
42 U.S.C. Sections 1985
(1), (2), and (3))

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1 Plaintiff ROBERT L. RUSSELL brings this action against the
2 United States Department of Justice, and other defendants, and
3 alleges as follows:

4
5 FIRST CLAIM FOR RELIEF

6 1. This is an action by ROBERT L. RUSSELL to redress the
7 deprivation of personal rights and privileges by acts perpetrated
8 in the furtherance of a conspiracy condemned in Title 42 United
9 States Code Section 1985, and is brought pursuant to Title 42
10 United States Code Sections 1983 and 1985 (1), (2), and (3).
11 Jurisdiction is conferred on this Court under Title 28 United
12 States Code Sections 1331 and 1342.

13 2. Defendants are agencies of the United States of America
14 together with past and present supervisors, agents, and employees
15 of same. Said agencies currently have offices within the Central
16 District of California; the violations of law described herein
17 occurred both within and without the Central District of
18 California and said acts are currently being performed both within
19 and without the Central District of California; and the resulting
20 injury to plaintiff has been and is being suffered within the
21 Central District of California.

22 3. On November 22, 1963, the Honorable John F. Kennedy, 35th
23 President of the United States, was shot by person and/or persons
24 unknown in violation of Texas criminal law in the City of Dallas,
25 County of Dallas, Texas, a jurisdiction then, as currently, under
26 competent civil authority, with all aspects of civil government
27 then and there functioning consistent with Texas law.

28 / / /

1 4. After having shot in Dealey Plaza, Dallas, Texas, the body
2 of President John F. Kennedy was driven and transported to
3 Parkland Memorial Hospital for emergency medical treatment. Upon
4 arrival at Parkland Memorial Hospital, President John F. Kennedy
5 was pronounced dead.

6 5. Upon being notified of the death of President John F.
7 Kennedy, supervisors, agents, and employees of all of the within
8 defendants conspired among and between themselves and agreed that
9 the body of our slain President had to be removed from Dallas,
10 Texas, in contravention of applicable Texas state law, for diverse
11 purposes, inter alia, a cover-up of the true cause of the death of
12 the President and the obstruction of a fair and impartial inquiry
13 into same.

14 6. Initially, said persons requested permission of the
15 requisite Texas civil authorities to remove the body of President
16 John F. Kennedy from Dallas, Texas, prior to the completion of an
17 autopsy then being conducted at Parkland Memorial Hospital
18 consistent with applicable Texas law when criminal agency is
19 suspected in a death.

20 7. However, and regardless of the fact that the murder of the
21 President of the United States was not then a federal crime, and
22 despite the unanimous response of the Texas civil authorities that
23 permission to remove the body of President John F. Kennedy prior
24 to the completion of the autopsy and issuance of a death
25 certificate was not then and would not be forthcoming, said
26 supervisors, agents and employees of all of the within defendants,
27 then and there conspiratorially decided, in contravention of Texas
28 state law, to remove the body of President John F. Kennedy from

1 the custody of those persons constitutionally obligated to
2 exercise the powers of their offices.

3 8. Accordingly, and in direct and clear contravention of
4 Texas state law, said within defendants, and said supervisors,
5 agents, and employees of same, unlawfully stole, seized, confined,
6 abducted, kidnapped, and carried away the body of President John
7 F. Kennedy for reward and benefit known otherwise only to them,
8 threatening force and violence to all who opposed them, and did,
9 in the course of said kidnapping, transport the body of President
10 John F. Kennedy in interstate commerce by taking said body to Air
11 Force One, then located at Love Field, Dallas, Texas, thence to
12 Andrews Air Force Base, Maryland, and thence to Bethesda Naval
13 Hospital, Bethesda, Maryland, all in violation of Title 18, United
14 States Code, Section 1201, and committed in the execution and
15 furtherance of a conspiracy by and between the within defendants
16 to prevent the duly constituted officers of the state of Texas
17 from exercising and performing their official duties, obstructing
18 justice, intimidating said officials, and depriving the plaintiff
19 and all of the citizens of the United States of their right and
20 privilege to know the true facts surrounding the death of
21 President John F. Kennedy, all in violation of Title 42, United
22 States Code, Sections 1985 (1), (2), and (3), and Title 42, United
23 States Code, Section 1983.

24 Wherefore, plaintiff ROBERT L. RUSSELL prays for judgment as
25 hereinafter set forth.

26 / / /

27 / / /

28 / / /

SECOND CLAIM FOR RELIEF

9. Plaintiff ROBERT L. RUSSELL incorporates by reference Paragraphs 1 through 8 as if fully set forth herein, and further alleges as follows:

10. Upon the arrival of the body of President John F. Kennedy at Bethesda Naval Hospital, the within defendants, and supervisors, agents, and employees of same, then knowing of the arrest in Dallas, Texas, of Lee Harvey Oswald, and by then fully aware of the suspicious background of said individual, conspired and determined among themselves to sabotage and prevent the execution and completion of a fair, full, and impartial autopsy of the body of President John F. Kennedy, so as to continue the cover-up and obstruction of justice initiated and begun in Dallas, Texas.

11. To this end, the body of President John F. Kennedy was physically altered so as to make impossible a fair, full and accurate autopsy.

12. Further, and to the same end, the autopsy was sloppily, inexpertly and incompetantly performed.

13. Further, and to the same end, medical records, X-rays, and physical evidence from and of the body of President John F. Kennedy were removed, misplaced, destroyed, lost, and/or committed to the National Archives under irrevocable seal; thus preventing the admissibility of same to and analysis and examination by members, agents, employees, and personnel of any duly authorized investigative body.

14. Further, and to the same end, notes and records of the autopsy were burned and destroyed for the same illicit purpose.

1 15. Said evidence was manufactured, lost, destroyed and/or
2 suppressed because it was perceived that evidence honestly
3 obtained did not and would not conform to the theory then being
4 advanced that Lee Harvey Oswald was the lone gunman and assassin
5 of President John F. Kennedy and would, in fact, establish that at
6 least two gunmen were involved in the murder and assassination of
7 President John F. Kennedy; all in violation of Title 42, United
8 States Code, Section 1983 and Title 42, United States Code,
9 Sections 1985 (1), (2), and (3).

10 Wherefore, plaintiff ROBERT L. RUSSELL prays for judgment as
11 hereinafter set forth.

12

13

THIRD CLAIM FOR RELIEF

14 16. Plaintiff ROBERT L. RUSSELL incorporates by reference
15 Paragraphs 1 through 15 as if fully set forth herein, and further
16 alleges as follows:

17 17. The investigation undertaken by the Federal Bureau of
18 Investigation disclosed that the 8-millemeter color motion picture
19 film taken by Abraham Zapruder not only did not conform to the Lee
20 Harvey Osawald/lone gunman/no conspiracy theory, but, in fact,
21 established beyond doubt that President John F. Kennedy had been
22 hit by gunshots fired from both the front and rear.

23 18. Accordingly, frames of the Zapruder film were
24 intentionally excised and removed and certain other frames were
25 transposed by the defendants and each of them giving the effect of
26 the President's body appearing to move forward from the impact of
27 a shot from the rear when, in fact, the body of the President was
28 violently propelled backwards from a shot from the front.

1 19. This doctored film was presented to the Warren Commission
2 by the defendants, and each of them, as irrefutable proof
3 confirming the theory that Lee Harvey Oswald, acting alone, had
4 fired three shots at President John F. Kennedy from the sixth
5 floor of the Texas School Book Depository Building and that all
6 physical injury to President John F. Kennedy and Texas Governor
7 John Connolly had been caused by these bullets and that no other
8 person or persons were involved in any way whatsoever with the
9 goings on in Dealey Plaza, Dallas, Texas.

10 20. Said doctored and false evidence was instrumental in the
11 deliberations of the Warren Commission and the eventual finding of
12 said Commission that Lee Harvey Oswald had acted alone and had
13 slain President John F. Kennedy and wounded Governor John
14 Connolly. The Warren Commission, in so finding, either
15 intentionally or unintentionally, had drawn down the shroud of
16 apparent finality on the issue and had rendered the defendant's
17 conspiracy to obstruct justice complete and successful. The end
18 of injustice had been achieved through the means of selective and
19 untruthful testimony and exhibits.

20 21. There the matter reposed until the formation of and
21 investigation by the House of Representatives Select Committee on
22 Assassinations.

23 22. Said Committee requested that the National Academy of
24 Sciences conduct a series of accoustical tests in and about Dealy
25 Plaza, Dallas, Texas, to determine the number of gunshots fired
26 therein on November 22, 1963, and the time intervals between said
27 gunshots.

28 / / /

1 23. Said organization conducted said tests and reported that
2 four (4) gunshots had been fired in and about Dealey Plaza, Dallas
3 Texas, on November 22, 1963, and, taking zero as the time of the
4 first shot, the second shot was fired 1.66 second later, the third
5 shot was fired 7.49 seconds after the first, and the fourth shot
6 was fired 8.31 seconds after the first. Further, based upon said
7 accoustical evidence, the first, second, and fourth shots were
8 fired from the right rear of President John F. Kennedy and the
9 third shot was fired from the front and to the right of the
10 President.

11 24. Said evidence, while refuting the Lee Harvey Oswald/lone
12 gunman/no conspiracy theory advanced by the within defendants and
13 each of them does not lessen, abate, or ameliorate the existence
14 and objectives of the within conspiracy or the methods employed by
15 the defendants and each of them to conspiratorially pass off as
16 factual that which they knew to be untrue, all of which was and is
17 violative of Title 42, United States Code, Section 1983 and Title
18 42, United States Code, Sections 1985 (1), (2), and (3), in that
19 said conspiracy continues to exist to the present day inasmuch as
20 plaintiff and the American people have yet to learn the truth of
21 the circumstances causing and surrounding the death of President
22 John F. Kennedy.

23 WHEREFORE, plaintiff ROBERT L. RUSSELL prays that the Court
24 enter judgment in his favor and against the within defendants and
25 each of them as follows:

26 (1) Declaring that a conspiracy has been perpetrated upon
27 plaintiff and the American people to prevent the American people
28 from learning the true facts surrounding the death of President

1 John F. Kennedy;

2 (2) Ordering the Senate of the United States and the United
3 States House of Representatives to conduct and/or resume
4 investigations into the circumstances surrounding the death of
5 President John F. Kennedy;

6 (3) For personal damages in the sum of One Million
7 (\$1,000,000.00) dollars;

8 (4) For costs of suit and for reasonable attorney's fees; and

9 (5) For any other proper relief.

10 DATED: *June 27, 1988*

Respectfully submitted,

Robert L. Russell

ROBERT L. RUSSELL
Attorney in Propria Persona

1 STATE OF CALIFORNIA)
2 COUNTY OF KINGS)

VERIFICATION

3 I, ROBERT L. RUSSELL, am the plaintiff in the above-entitled
4 action.

5 I have read the foregoing COMPLAINT FOR INFRINGEMENT OF CIVIL
6 RIGHTS AND FOR DECLARATORY RELIEF and know the contents thereof,
7 and I certify that the facts set forth therein are true of my own
8 knowledge, except for those matters which are therein stated on
9 information and/or belief, and as to those matters, I believe them
10 to be true.

11 I declare under penalty of perjury under the laws of the
12 State of California that the foregoing is true and correct this
13 27 day of June, 1988, at Corcoran, California.

Robert L Russell

ROBERT L. RUSSELL

CIVIL COVER SHEET

The JS-44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I (a) PLAINTIFFS

ROBERT L. RUSSELL

DEFENDANTS

UNITED STATES DEPARTMENT OF JUSTICE,
FBI, UNITED STATES TREASURY
DEPARTMENT, SECRET SERVICE, UNITED
STATES AIR FORCE, UNITED STATES NAVY

(b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF LOS ANGELES
(EXCEPT IN U.S. PLAINTIFF CASES)

COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT _____
(IN U.S. PLAINTIFF CASES ONLY)
NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE
TRACT OF LAND INVOLVED

(c) ATTORNEYS (FIRM NAME, ADDRESS, AND TELEPHONE NUMBER)

ROBERT L. RUSSELL, IPP
B-80190
305A -- 217L
P.O. Box 3456
Corcoran, California 93212

ATTORNEYS (IF KNOWN)

88-03718

II. BASIS OF JURISDICTION

(PLACE AN X IN ONE BOX ONLY)

- ☐ 1 U.S. Government Plaintiff
☒ 2 U.S. Government Defendant
☐ 3 Federal Question (U.S. Government Not a Party)
☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES

(For Diversity Cases Only)

(PLACE AN X IN ONE BOX FOR PLAINTIFF AND ONE BOX FOR DEFENDANT)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | ☐ 1 | ☐ 1 | Incorporated or Principal Place of Business in This State | ☐ 4 | ☐ 4 |
| Citizen of Another State | ☐ 2 | ☐ 2 | Incorporated and Principal Place of Business in Another State | ☐ 5 | ☐ 5 |
| Citizen or Subject of a Foreign Country | ☐ 3 | ☐ 3 | Foreign Nation | ☐ 6 | ☐ 6 |

IV. CAUSE OF ACTION

(CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE A BRIEF STATEMENT OF CAUSE.)

DO NOT CITE JURISDICTIONAL STATUTES UNLESS DIVERSITY

42 U.S.C. Section 1983 - Deprivation of Rights
42 U.S.C. Section 1985 (1), (2), (3) - Conspiracy, Obstruction of Justice

V. NATURE OF SUIT (PLACE AN X IN ONE BOX ONLY)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
☐ 110 Insurance ☐ 120 Marine ☐ 130 Motor Act ☐ 140 Negotiable Instrument ☐ 150 Recovery of Overpayment & Enforcement of Judgment ☐ 151 Medicare Act ☐ 152 Recovery of Defaulted Student Loans (Excl. Veterans) ☐ 153 Recovery of Overpayment of Veterans' Benefits ☐ 160 Stockholders' Suits ☐ 190 Other Contract ☐ 195 Contract Product Liability	PERSONAL INJURY ☐ 310 Airplane ☐ 315 Airplane Product Liability ☐ 320 Assault, Libel & Slander ☐ 330 Federal Employers' Liability ☐ 340 Marine ☐ 345 Marine Product Liability ☐ 350 Motor Vehicle ☐ 355 Motor Vehicle Product Liability ☐ 360 Other Personal Injury PERSONAL INJURY ☐ 362 Personal Injury—Med Malpractice ☐ 365 Personal Injury—Product Liability ☐ 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY ☐ 370 Other Fraud ☐ 371 Theft in Lending ☐ 380 Other Personal Property Damage ☐ 385 Property Damage Product Liability	☐ 610 Agriculture ☐ 620 Food & Drug ☐ 630 Liquor Laws ☐ 640 R.R. & Truck ☐ 650 Airline Regs. ☐ 660 Occupational Safety/Health ☐ 699 Other LABOR ☐ 710 Fair Labor Standards Act ☐ 720 Labor/Mgmt. Relations ☐ 730 Labor/Mgmt. Reporting & Disclosure Act ☐ 740 Railway Labor Act ☐ 790 Other Labor Legislation ☐ 791 Empl. Ret. Inv. Security Act	☐ 422 Appeal 28 USC 158 ☐ 423 Writ/Remedial 28 USC 157 PROPERTY RIGHTS ☐ 820 Copyrights ☐ 830 Patent ☐ 840 Trademark SOCIAL SECURITY ☐ 861 HRA (1395f) ☐ 862 Black Lung (823) ☐ 863 OWB (408(g)) ☐ 864 OWB (408(g)) ☐ 865 RSI (405(g)) FEDERAL TAX SUITS ☐ 870 Taxes (U.S. Plaintiff or Defendant) ☐ 871 IRS—Third Party 28 USC 7809	☐ 400 State Reapportionment ☐ 410 Antitrust ☐ 430 Banks and Banking ☐ 450 Commerce/ICC Rates/etc. ☐ 460 Deportation ☐ 470 Racketeer Influenced and Corrupt Organizations ☐ 810 Selective Service ☐ 850 Securities/Commodities/Exchange ☐ 875 Customer Challenge 12 USC 3410 ☐ 881 Agricultural Acts ☐ 882 Economic Stabilization Act ☐ 883 Environmental Matters ☐ 884 Energy Allocation Act ☐ 886 Freedom of Information Act ☐ 900 Appeal of Fee Determination Under Equal Access to Justice ☐ 950 Constitutionality of State Statutes ☐ 990 Other Statutory Actions
REAL PROPERTY ☐ 210 Land Condemnation ☐ 220 Foreclosure ☐ 230 Rent Lease & Ejectment ☐ 240 Torts to Land ☐ 245 Tort Product Liability ☐ 290 All Other Real Property	CIVIL RIGHTS ☐ 441 Voting ☐ 442 Employment ☐ 443 Housing/Accommodations ☐ 444 Welfare ☒ 440 Other Civil Rights PRISONER PETITIONS ☐ 510 Motions to Vacate Sentence ☐ 530 Habeas Corpus ☐ 540 Mandamus & Other ☐ 550 Civil Rights			

VI. ORIGIN

(PLACE AN X IN ONE BOX ONLY)

- ☒ 1 Original Proceeding
☐ 2 Removed from State Court
☐ 3 Remanded from Appellate Court
☐ 4 Reinstated or Reopened
☐ 5 Transferred from another district (specify) _____
☐ 6 Multidistrict Litigation
☐ 7 Appeal to District Judge from Magistrate Judgment

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION
☐ UNDER F.R.C.P. 23

DEMAND \$ 1,000

Check YES only if demanded in complaint:

JURY DEMAND:

☐ YES ☐ NO

VIII. RELATED CASE(S) (See reverse side & separate instructions sheet) IF ANY

Judge

Docket No.

DATE

SIGNATURE OF ATTORNEY OF RECORD

X June 27, 1988

Robert L. Russell

UNITED STATES DISTRICT COURT

(CONTINUED ON REVERSE SIDE)

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

NOTICE OF ASSIGNMENT TO UNITED STATES MAGISTRATE

Pursuant to the Local Rules Governing Duties of
Magistrates, Magistrate John R. Kronenberg
has been designated to hear discovery motions in
the within action at the discretion of the assigned
Judge.

Upon the filing of a discovery motion, the motion
will be presented to the United States District Judge
for consideration and may hereafter be referred to the
Magistrate for hearing and determination.

The Magistrate's initial should be used on all documents
filed with the Court so that the case number reads as
follows:

88-03718

CV -

WMB
(Kx)

NOTE: A COPY OF THIS NOTICE MUST BE SERVED WITH THE
SUMMONS AND COMPLAINT ON ALL DEFENDANTS.